

COURT OF APPEALS
DIVISION TWO
OF THE STATE OF WASHINGTON

FILED
COURT OF APPEALS
DIVISION II

2014 JAN 23 PM 12:00
STATE OF WASHINGTON

STATE OF WASHINGTON
Respondent

BY

DEPUTY

v.

DEVON M. DANIELS

(your name)

Appellant.

No. 44382-1-11

STATEMENT OF ADDITIONAL
GROUND FOR REVIEW

I, DEVON DANIELS, have received and reviewed the opening brief prepared by my attorney. Summarized below are the additional grounds for review that are not addressed in that brief. I understand the Court will review this Statement of Additional Grounds for Review when my appeal is considered on the merits.

Additional Ground 1

I BELIEVE THE COURT ERRED BY NOT ADMITTING A LESSER INCLUDED OFFENSE OF (TRESPASS) FOR THE BURGLARY CHARGE. MY JURY INSTRUCTIONS NEVER HAD A LESSER INCLUDED OFFENSE, WHICH ~~IT~~ WOULD HAVE BEEN (TRESPASS) FOR BURGLARY. THIS IS WHERE THE COURT ERRED.

Additional Ground 2

MR FRIESEN OPENLY LIED IN COURT ABOUT LYING TO THE 911 DISPATCHER DURING THE INITIAL 911 CALL. HE TOLD THE DISPATCHER THAT HE JUST BEEN ROBBED, AND THE PERPATRATOR PUSHED HIM ON THE WAY OUT. HE LIED AND SAID (I) DEVON DANIELS PUSHED HIM. THERE'S A VIDEO TAPE CLEARLY SHOWING ME EXITING THE STORE, AND NO INDICATION OF A PUSH. MR. FRIESEN (LIED) IF HE LIED ABOUT ME PUSHING HIM, WHY WOULDN'T HE LIE ABOUT ME BREAKING INTO HIS OFFICE?

If there are additional grounds, a brief summary is attached to this statement.

Date:

1-19-14

Signature:

Devon Daniels